

1 Steven A. Alpert, NV Bar # 8353
2 PRICE LAW GROUP, APC
3 5940 S Rainbow Blvd,
4 Las Vegas, NV 89118
5 T: (866) 881-2133
6 F: (866) 401-1457
E: alpert@pricelawgroup.com
Attorneys for Plaintiff,
Gregorio Guevara Andrade

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 Gregorio Guevara-Andrade,

10 Plaintiff,

11 v.

12 Experian Information Solutions, Inc.,
13 Prestige Chrysler Jeep Dodge, LLC, and
14 Americredit Financial Services, Inc.,
15 d/b/a General Motors Financial
Company, Inc.

16 Defendants.

Case No.: 2:20-cv-00332-APG-DJA

STIPULATION AND ORDER TO
EXTEND TIME TO REPLY TO MOTION
TO DISMISS
(FIRST REQUEST)

18 Pursuant to Local Rule IA 6-1(a), 6-2 and 7-1, and Federal Rule of Civil Procedure
19 6(b), Plaintiff Gregorio Guevara-Andrade (“Plaintiff”) and Defendant Prestige Chrysler
20 Jeep Dodge, LLC (“Prestige”), by and through their respective counsel of record, stipulate
21 as follows:

22 On July 6, 2020, the Court reinstated the Motion to Dismiss filed by Prestige. That
23 same day, Prestige learned that (1) Defendant Experian Information Solutions, Inc. and
24 Plaintiff had reached a settlement and (2) Defendant Americredit Financial Services, Inc.
25 and Plaintiff were anticipating a resolution as well. In light of the fact that the Defendants
26 and Plaintiff were anticipating a resolution as well. In light of the fact that the Defendants
27 and Plaintiff were anticipating a resolution as well. In light of the fact that the Defendants
28 and Plaintiff were anticipating a resolution as well. In light of the fact that the Defendants

1 subject to the federal claims will be dismissed from the suit, counsel for Prestige and
2 Plaintiff conferred and determined that it would be the best use of the parties resources
3 and the Court's time to extend the time for Prestige to reply in support of their Motion to
4 Dismiss (if at all). Rule 6(b) requires the Court to approve an extension of time for
5 Prestige to file a responsive pleading, and therefore the Parties collectively request the
6 Court approve the agreement, as set forth below:

- 7
- 8 1. This is the Parties' first stipulation for an enlargement of time to reply to an
9 opposition.
- 10 2. On July 8, 2020, Plaintiff filed his Opposition to Defendant's Prestige's Motion to
11 Dismiss, making Defendant's reply due by July 15, 2020.
- 12 3. The Parties stipulate and agree that the deadline for Defendant to file a reply to
13 Plaintiff's Opposition shall be extended to August 7, 2020.
- 14
- 15

16 /././

17 /././

18 /././

19 /././

20 /././

21 /././

22 /././

23 /././

24 /././

25 /././

26 /././

27 /././

28

1 4. The parties request this extension to allow counsel time for informal discovery and
2 settlement discussions. This stipulation is not made for the purpose of delay and
3 is intended to preserve the parties and the Court's resources.
4

5 DATED: July 10, 2020
6

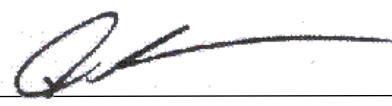
7 RESPECTFULLY SUBMITTED,
8

9 */s/Steven A. Alpert*
10 Steven A. Alpert, NV Bar # 8353
11 PRICE LAW GROUP, APC
12 5940 S Rainbow Blvd,
13 Las Vegas, NV 89118
14 T: (866) 881-2133
15 F: (866) 401-1457
16 E: alpert@pricelawgroup.com
17 *Attorneys for Plaintiff,*
18 *Gregorio Guevara Andrade*
19

20 */s/Krista J. Nielson*
21 Krista J. Nielson (Nevada Bar No. 10698)
22 10100 W. Charleston Blvd, Ste. 220
23 Las Vegas, NV 89135
24 Telephone: 702.258.8200
25 Facsimile: 702.258.8787
26 E-Mail: knielson@tblaw.com
27 *Attorneys Defendant*
28 *Prestige Chrysler Jeep Dodge, LLC*

21 **ORDER**
22

23 IT IS SO ORDERED.
24

25 
26

27 UNITED STATES DISTRICT JUDGE
28 Dated: July 10, 2020.